



New Jersey

P.O. Box 32159
Newark, NJ 07102
Tel: 973-642-2086
Fax: 973-642-6523
info@aclu-nj.org
www.aclu-nj.org

JEANNE LOCICERO
Legal Director
jlocicero@aclu-nj.org
973-854-1715

June 17, 2025

VIA ECF

Honorable Katharine S. Hayden, U.S.D.J.
United States District Court
District of New Jersey
Frank R. Lautenberg Post Office and U.S. Courthouse
2 Federal Square, Courtroom 5
Newark, New Jersey 07101

Re: *Student Doe #1, et al. v. Noem, et al.*, 2:25-cv-02998 (KSH) (AME)

Dear Judge Hayden:

I write on behalf of Plaintiffs in the above-captioned matter regarding a proposed schedule for amending the complaint in this action and in anticipation of briefing for a motion to dismiss. After conferring with counsel for the Defendants and with their consent, I submit the following joint proposal:

- Amended Complaint: June 27, 2025
- Defendants' Motion to Dismiss: August 4, 2025
- Plaintiffs' Opposition to Motion: September 10, 2025
- Defendants' Reply: September 24, 2025

We appreciate the Court's consideration of this schedule and are prepared to make adjustments if the Court requires.

**Request granted.
SO ORDERED this 20th day of June, 2025.**

**s/Katharine S. Hayden
Hon. Katharine S. Hayden, U.S.D.J.**

Respectfully submitted,



Jeanne LoCicero

**American Civil Liberties Union
of New Jersey Foundation**
Jeanne LoCicero, Esq.
Farrin R. Anello, Esq.
Molly K.C. Linhorst, Esq.
570 Broad Street, 11th Floor
Newark, New Jersey 07102
(973) 854-1715